

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

JENNIFER LIOTTA, on behalf of herself
and all others similarly situated,

Plaintiff,

vs.

WOLFORD BOUTIQUES, LLC

Defendant.

Case No. 1:16-cv-04634-MHC

**SUPPLEMENTAL DECLARATION OF JENNIFER M. KEOUGH
REGARDING ADMINISTRATION OF NOTICE PROGRAM**

I, JENNIFER M. KEOUGH, declare and state as follows:

1. I am the Chief Executive Officer (“CEO”) at JND Class Action Administration LLC (“JND”). This declaration (“Declaration”) is based on my personal knowledge, as well as upon information provided to me by experienced JND employees, and if called upon to do so, I could and would testify competently thereto.

2. I have more than 20 years of legal experience creating and supervising multiple Notice and Claims Administration programs and have personally overseen well over 500 matters.

3. JND is a legal administration services provider with its headquarters located in Seattle, Washington. JND has extensive experience with all aspects of legal administration and has administered settlements in hundreds of class action cases.

4. As CEO of JND, I am involved in all facets of our Company's operation. Among my responsibilities is to monitor the implementation of our Settlement Administration programs.

5. This Declaration supplements the Declaration of Jennifer M. Keough Regarding Administration of Notice Program filed on August 8, 2018.

DISSEMINATION OF NOTICE VIA U.S. MAIL

6. As of November 7, 2018, 4,053 or approximately 95% of the 4,264 Class Members were mailed a Notice that has not been returned to JND as undeliverable.

SETTLEMENT WEBSITE

7. Pursuant to the Settlement Agreement, the Claims Deadline passed 90 days after the Notice Deadline, on November 5, 2018. With approval of the Parties, at midnight (EST) on November 6, 2018, JND shut down the online claim filing portal. Class Members may continue to visit the settlement-specific website ("Settlement Website"), www.tcpaclassbenefits.com/wolford/, which allows them to learn more about the case. Downloadable PDF copies of the First Amended Complaint, Settlement Agreement, Preliminary Approval Order, Notice, and Claim Form are available on the Settlement Website. JND will continue to maintain the Settlement Website until at least 30 days after distribution of the funds and Final Approval, pursuant to the Settlement Agreement. As of November 7, 2018, the Settlement Website has hosted 3,447 new users and 7,639 pageviews.

8. Attached hereto as Exhibit A is a true and correct copy of the website as it substantially existed and was publicly available from July 27, 2018 through November 5, 2018.

9. Attached hereto as Exhibit B is a true and correct copy of the website as it existed beginning on or about November 6, 2018 and remains publicly available.

10. As of November 7, 2018, JND has received and responded to 26 emails.

TOLL-FREE INFORMATION LINE

11. On or before July 27, 2018, JND established the settlement-specific dedicated toll-free IVR number, 1-833-288-5301, for Class Members to call for additional information.

12. As of November 7, 2018, 94 calls have been handled by JND agents.

CLAIMS PROCESSING

13. The submission and postmark Claims Deadline passed on November 5, 2018. JND will continue to accept as timely, any Claim Forms postmarked November 5, 2018.

14. As of November 7, 2018, JND has received 264 claims, of which 91 are valid. The remaining 173 were submitted by non-Class Members and denied.

EXCLUSION REQUESTS

15. The Notice directed any Settlement Class Members who wished to exclude themselves (“opt-out”) from the Settlement Class to submit their request, postmarked no later than October 5, 2018.

16. As of the date of this Declaration, JND has not received any opt-out requests.

17. Attached hereto as Exhibit C are the reports that were sent to Counsel as required by the Settlement Agreement and this Court's Order Granting Preliminary Approval.

OBJECTIONS

18. The Notice directed Settlement Class Members who wished to object to the Settlement Agreement to mail their written request to Class Administrator postmarked by October 5, 2018.

19. As of the date of this Declaration, JND has not received any objections.

20. Based on the 95% direct Settlement Notice deliverability rate, timely and valid claims filed by Settlement Class Members, Class Member contact by phone and email, and lack of Class Member exclusions and objections, the Settlement Notice Program was sufficient, reasonable, and appropriate.

I declare under the penalty of perjury pursuant to the laws of the United States of America that the foregoing is true and correct.

Executed on November 8, 2018 at Seattle, WA.



JENNIFER M. KEOUGH

EXHIBIT A

Welcome to the *Liotta v. Wolford Boutiques, LLC* Settlement Site

Important Update: The Final Approval Hearing has been scheduled for **Tuesday, November 20, 2018, at 10:00 a.m. [EST]**.

If you received a text message from Wolford America, Inc. on July 7, 2016 and/or on September 2, 2016 you may be eligible for benefits from a TCPA Class Action Settlement.

What is this lawsuit about?

On July 7, 2016, and again on September 2, 2016, Wolford America, Inc. ("Wolford") sent the Text Message(s) to the Plaintiff and many other recipients. Plaintiff contends that the Text Message(s) did not comply with and violated the federal statute, known as the Telephone Consumer Protection Act ("TCPA") 47 USC § 227. Plaintiff claims, and Wolford denies, that the Text Message(s) failed to include proper description of the sender of the text and failed to include a proper opt-out mechanism. Wolford denies any wrongdoing, and no court or other judicial entity has made any judgment or other determination of any wrongdoing. Nonetheless, to avoid the further costs of litigation, Wolford has agreed to settle.

Additional information about the settlement and important court documents may be found on the **Important Documents** and **FAQs** pages of this website.

Who is included?

You are a member of the Settlement Class if you received either or both of the Text Message(s). The person who owned the telephone number on July 7, 2016, and/or September 2, 2016, is a Class Member.

**CLICK HERE TO SEE IF YOUR
TELEPHONE NUMBER IS ELIGIBLE**

Your Legal Rights and Options

Submit a Claim Form	To receive a Gift Card, you will need to submit a Claim Form on this website by NOVEMBER 5, 2018 or submit a Claim Form by mail, which must be postmarked by NOVEMBER 5, 2018 .
Do Nothing	If you are a Settlement Class Member and do nothing, then you will not receive a Gift Card and your Claims against Wolford and its affiliates will be released.
Exclude Yourself (Expired)	If you want to keep the right to sue or continue to sue Wolford based on Claims this settlement resolves, you must exclude yourself from the settlement. Your exclusion request must be mailed, postmarked no later than OCTOBER 5, 2018 , to the Claims Administrator.
Object (Expired)	If you are a Settlement Class Member, you can object to the settlement if you don't think it is fair, reasonable, or adequate. You can give reasons why you think the Court should not approve it. Your objection must be mailed, postmarked no later than OCTOBER 5, 2018 , to the Claims Administrator.

Additional information about your legal rights and options, as well as specific procedures, may be found on the **Important Documents** and **FAQs** pages of this website.

IMPORTANT DOCUMENTS

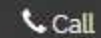
(To view/download a document, click its name.) [Get Adobe Reader](#)

Documents

[First Amended Complaint](#)[Settlement Agreement](#)[Preliminary Approval Order](#)[Notice](#)[Claim Form](#)[Order Continuing Hearing](#)

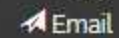
FOR MORE INFORMATION

Visit this website often to get the most up-to-date information.



Call

[1-833-288-5301](tel:1-833-288-5301)



Email

info@tcpaclassbenefits.com



Mail

Liotta v. Wolford Boutiques, LLC Settlement
JND Legal Administration
PO Box 91349
Seattle, WA 98111

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FREQUENTLY ASKED QUESTIONS

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BASIC INFORMATION

1. Why is there a notice?

A Court authorized the notice because you have a right to know about a proposed settlement in a lawsuit against Wolford America, Inc. ("Wolford"), and all of your options, before the Court decides whether to give final approval to the settlement. The notice explains the nature of the lawsuit, the general terms of the settlement, and your legal rights and options.

The lawsuit was brought on behalf of persons who received either one or two text messages from Wolford on either or both July 7, 2016 and September 2, 2016. The text messages read as follows:

July 7, 2016: Final Sale: Shop Now And Save 50% On Select Styles and Colors. Shop in-store or online-> http://bit.ly/WOLFSALE16_US or call: 800-488-3103

September 2, 2016: New Collection Gets Even Better: The Second Drop Is Here. Shop now-><http://bit.ly/WOLFNEW1617> or call at: 08002798279. IE: 1890930204 SE: 0770930555 DK: 80888653 FIN: 0800918403

(These text messages will be referred to in the notice as the "Text Message(s)").

Judge Cohen of the U.S. District Court for the Northern District of Georgia is overseeing this litigation. The litigation is known as Jennifer Liotta, et al. v. Wolford Boutiques, LLC, Case No. 1:16-cv-04634-MHC. One of the persons who received the text, Jennifer Liotta, sued Wolford and is called the "Plaintiff." Wolford is called the "Defendant."

2. What is this lawsuit about?

On July 7, 2016, and again on September 2, 2016, Wolford sent the Text Message(s) to the Plaintiff and many other recipients. Plaintiff contends that the Text Message(s) did not comply with and violated the federal statute, known as the Telephone Consumer Protection Act ("TCPA") 47 USC § 227. Plaintiff claims, and Wolford denies, that the Text Message(s) failed to include proper description of the sender of the text and failed to include a proper opt-out mechanism. Wolford denies any wrongdoing, and no court or other judicial entity has made any judgment or other determination of any wrongdoing. Nonetheless, to avoid the further costs of litigation, Wolford has agreed to settle.

In a class action, one or more people called "class representatives" sue on behalf of themselves and other people with similar claims. All of these people together are the "class" or "class members." One court resolves the issues for all class members, except for those who exclude themselves from the settlement class. A class action is useful for pursuing claims that would otherwise be of too low a dollar value for just one Plaintiff to pursue.

- 4. Why is there a settlement?

The Court has not decided in favor of Plaintiff or Wolford. Instead, both sides agreed to a settlement. Settlements avoid the costs and uncertainty of a trial and related appeals, while providing benefits to members of the settlement class ("Settlement Class Members"). The "Settlement Class Representative" appointed to represent the class, and the attorneys for the Settlement Class ("Settlement Class Counsel," see Question 14) think the settlement is best for all Settlement Class Members.

WHO IS PART OF THE SETTLEMENT?

- 5. How do I know if I am part of the settlement?

You are a member of the Settlement Class if you received either or both of the Text Message(s). Wolford's records indicate that a number associated with you received one or both of the Text Message(s). The person who owned the telephone number on July 7, 2016, and/or September 2, 2016, is a Class Member.

YOU CAN CHECK THIS WEBSITE FOR FREE WHETHER YOU ARE A CLASS MEMBER. ENTER THE PHONE NUMBER YOU HAD ON JULY 7, 2016 AND/OR SEPTEMBER 2, 2016 AND FIND OUT IF YOU'RE A CLASS MEMBER.

Alternatively, if you are not sure whether you are included in the Settlement Class, call **1-833-288-5301**.

THE SETTLEMENT BENEFITS

- 6. What does the settlement provide?

Wolford has agreed to provide Gift Cards (\$60 or \$120) to eligible Settlement Class Members that can be used through any Wolford store or redeemed at **www.wolfordshop.com**. Wolford has also agreed to pay attorneys' fees, costs, and expenses (see Question 15) and the costs of notifying the Class and administering the settlement. Wolford will also pay a Service Award to the Class Representative.

A more detailed description of these benefits is available in the Settlement Agreement which is available at the **Important Documents** page of this website.

- 7. What can I get from the settlement?

Gift Card: Class Members who received just one of the Text Message(s) will each receive a \$60.00 gift card provided they submit a timely Claim Form. Class Members who received both Text Message(s) will receive a \$120.00 gift card provided they submit a timely Claim Form. Gift Cards are transferable and have no expiration date. You must submit a Claim Form to receive the Gift Card. **You can submit a Claim Form by simply filling out the online claim submission form through this website or you can mail the same. You can check this website for free to find out whether you are a Class Member.**

- 8. Will I receive a \$60 or \$120 Gift Card?

The Settlement Class has two levels of members.

Tier One Class Members will receive a \$60 Gift Card. Tier One Class Members are recipients that received just one of the Text Message(s).

Tier Two Class Members will receive a \$120.00 Gift Card. Tier Two Members are recipients that received both of the Text Message(s).

There is no reduction of award to Class Members that will result from the level of Class Member participation in this settlement. All Class Members who submit timely Claim Forms and who received either one or both of the Text Message(s) will receive the Tier One or the Tier Two Gift Card. The amount of the Service Fee and Attorneys' Fees paid by Wolford pursuant to this Settlement is in addition to and will not impact the amounts paid to Class Members.

HOW TO GET BENEFITS?

- 9. How do I get a Gift Card?

To get a Gift Card, you will need to submit a Claim Form through this website by **NOVEMBER 5, 2018** or submit a Claim Form by mail, which must be postmarked by **NOVEMBER 5, 2018**. The Claim Form is posted on the **Important Documents** page of the website or by calling **1-833-288-5301**.

Submitting a Claim Form is easy, taking a few minutes maximum.

- 10. When will I receive my Gift Card?

If you submit a complete, accurate, valid, and timely Claim Form, the Settlement Administrator will send your Gift Card to you after the settlement is finally approved and all appeals and other reviews have been resolved or exhausted. The process is likely to take several months.

- 11. What am I giving up to stay in the Settlement Class?

Unless you exclude yourself from the settlement, you will give up your right to sue Wolford and its affiliates/vendors or be part of any other lawsuit against Wolford and its affiliates/vendors about the issues this settlement resolves. Unless you exclude yourself, all of the Court's decisions will bind you. The specific claims you are giving up against Wolford and other released parties affiliated with Wolford are called "Claims." The Claims are described in the Settlement Agreement which is available at the **Important Documents** page of this website. The Settlement Agreement describes the Claims you would be releasing with specific and accurate legal descriptions, so read it carefully.

- EXCLUDING YOURSELF FROM THE SETTLEMENT

If you want to keep the right to sue or continue to sue Wolford based on Claims this settlement resolves, you must take steps to get out of the Settlement Class.

- 12. How do I exclude myself from the settlement?

The deadline to opt out of the Settlement was on **OCTOBER 5, 2018**.

13. If I exclude myself, can I still get a Gift Card or the benefit of the Injunction?

No. If you exclude yourself, you cannot receive the Gift Card or the benefit of the Injunction.

THE LAWYERS REPRESENTING YOU

14. Do I have a lawyer in the case?

Yes. The Court appointed the following attorneys to represent you and other Settlement Class Members as "Settlement Class Counsel." Class Counsel in this case are Scott L. Bonder and Joseph A. White of Fried & Bonder, LLC, 1170 Howell Mill Road, NW, Suite 305, Atlanta, Georgia 30318.

You will not be charged by these lawyers for their work on the case. If you want to be represented by your own lawyer, you may hire one at your own expense.

15. How will the lawyers be paid?

Settlement Class Counsel will ask the Court to award attorneys' fees, and reimburse reasonable costs and expenses. Wolford has agreed to jointly move for approval by the Court of a payment directly from Wolford to Class Counsel in the amount of \$137,480.00. These fees and costs will be paid separately by Wolford and will not reduce the amount of benefits provided to the Class.

OBJECTING TO THE SETTLEMENT

16. How do I tell the Court that I don't like the settlement?

The deadline to object to the Settlement was on **OCTOBER 5, 2018**.

17. What's the difference between objecting and excluding myself?

Objecting is simply telling the Court that you don't like something about the settlement, but you remain a member of the Settlement Class.

Excluding yourself is telling the Court that you don't want to be included in the settlement. If you exclude yourself, you have no basis to object to the settlement and related releases because the settlement no longer affects you.

FINAL APPROVAL HEARING**- 18. When and where will the Court decide to approve the settlement?**

The Court will hold a Final Approval Hearing at **10:00 a.m. [EST]** on **November 20, 2018**, in the Courtroom of Judge Cohen at the U.S. District Court for the Northern District of Georgia, located in Courtroom 1905 of the Richard B. Russell Federal Building and United States Courthouse, 75 Ted Turner Dr., SW, Atlanta, Georgia 30303-3309. The hearing may be postponed to a different date or time without notice, so it is a good idea to check this website or call **1-833-288-5301**.

At the Final Approval Hearing, the Court will consider whether the settlement is fair, reasonable, and adequate. If there are objections, the Court will consider them. The Court will listen to people who appear at the hearing. The Court may also decide how much Settlement Class Counsel will receive as attorneys' fees and costs and whether to award service payments to Settlement Class Representatives. After the Final Approval Hearing, the Court will decide whether to approve the settlement. We do not know how long these decisions will take.

- 19. Do I have to come to the hearing?

No. Settlement Class Counsel will answer questions the Court may have. However, you are welcome to come at your own expense. If you submit a written objection, you don't have to come to Court to talk about it. As long as you submitted your written objection on time, the Court will consider it. You may also pay your own lawyer to attend, but it's not necessary.

IF I DO NOTHING**- 20. What happens if I do nothing?**

If you are a Settlement Class Member and do nothing, then you will not receive a Gift Card and your Claims against Wolford and its affiliates will be released. This means that you will not be able to start a lawsuit or be part of another lawsuit against Wolford or its affiliates over the Claims resolved by the settlement. You will receive the benefit of the injunction.

GETTING MORE INFORMATION**- 21. How do I get more information?**

The notice summarizes the settlement. More details are in the Settlement Agreement itself. You can get a copy of the Settlement Agreement at the **Important Documents** page of this website or from the Settlement Administrator by calling toll-free **1-833-288-5301** or writing to the Settlement Administrator at *Liotta v. Wolford Boutiques, LLC Settlement*, JND Legal Administration, P.O. Box 91349, Seattle, WA 98111. The status of the settlement, any appeals, any claims made, and the date of award distributions will be posted on the Settlement Website.

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Telephone Number

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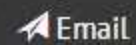
FOR MORE INFORMATION

Visit this website often to get the most up-to-date information.



Call

1-833-288-5301



Email

info@tcpaclassbenefits.com



Mail

Liotta v. Wolford Boutiques, LLC Settlement,
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Liotta v. Wolford Boutiques, LLC Settlement

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CONTACT US

IMPORTANT: Before contacting the Claims Administrator, please review the **FAQs** page, which provides the answers to many basic questions.

Mailing Address

Liotta v. Wolford Boutiques, LLC Settlement
c/o JND Legal Administration
PO Box 91349
Seattle, WA 98111

Telephone

1-833-288-5301

Email

info@tcpaclassbenefits.com

Note: For security purposes, all address updates must be made in writing. To update your address, please email the Claims Administrator using the email form below, or update your address via mail. Please include the settlement name, Liotta v. Wolford Boutiques, LLC Settlement, and your old mailing address for verification purposes.

Email Us

When contacting the Claims Administrator via email, please complete the form below and we will respond to your request at the email address provided.

Topic	<input type="text" value="[Choose reason for contact]"/>	Address	<input type="text"/>
Name	<input type="text"/>		
Telephone	<input type="text"/>	City	<input type="text"/>
Email Address	<input type="text"/>	State/Province	<input type="text"/>
		Zip/Postal Code	<input type="text"/>
		Question/Comments	<input type="text"/>

SUBMIT

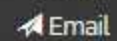
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Mail

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Seattle, WA 98111

EXHIBIT B

Welcome to the *Liotta v. Wolford Boutiques, LLC* Settlement Site

Important Updates:

- The Claims Deadline passed on **November 5, 2018**.
- The Final Approval Hearing has been scheduled for **Tuesday, November 20, 2018, at 10:00 a.m. [EST]**

If you received a text message from Woford America, Inc. on July 7, 2016 and/or on September 2, 2016 you may be eligible for benefits from a TCPA Class Action Settlement.

What is this lawsuit about?

On July 7, 2016, and again on September 2, 2016, Woford America, Inc. ("Woford") sent the Text Message(s) to the Plaintiff and many other recipients. Plaintiff contends that the Text Message(s) did not comply with and violated the federal statute, known as the Telephone Consumer Protection Act ("TCPA") 47 USC § 227. Plaintiff claims, and Woford denies, that the Text Message(s) failed to include proper description of the sender of the text and failed to include a proper opt-out mechanism. Woford denies any wrongdoing, and no court or other judicial entity has made any judgment or other determination of any wrongdoing. Nonetheless, to avoid the further costs of litigation, Woford has agreed to settle.

Additional information about the settlement and important court documents may be found on the **Important Documents** and **FAQs** pages of this website.

Who is included?

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Your Legal Rights and Options

Submit a Claim Form (Expired)	To receive a Gift Card, you will need to submit a Claim Form on this website by NOVEMBER 5, 2018 or submit a Claim Form by mail, which must be postmarked by NOVEMBER 5, 2018 .
Do Nothing	If you are a Settlement Class Member and do nothing, then you will not receive a Gift Card and your Claims against Woford and its affiliates will be released.
Exclude Yourself (Expired)	If you want to keep the right to sue or continue to sue Woford based on Claims this settlement resolves, you must exclude yourself from the settlement. Your exclusion request must be mailed, postmarked no later than OCTOBER 5, 2018 , to the Claims Administrator.
Object (Expired)	If you are a Settlement Class Member, you can object to the settlement if you don't think it is fair, reasonable, or adequate. You can give reasons why you think the Court should not approve it. Your objection must be mailed, postmarked no later than OCTOBER 5, 2018 , to the Claims Administrator.

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IMPORTANT DOCUMENTS

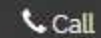
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Documents

[First Amended Complaint](#)[Settlement Agreement](#)[Preliminary Approval Order](#)[Notice](#)[Claim Form](#)[Order Continuing Hearing](#)

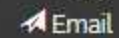
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FREQUENTLY ASKED QUESTIONS

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(These text messages will be referred to in the notice as the "Text Message(s)").

Judge Cohen of the U.S. District Court for the Northern District of Georgia is overseeing this litigation. The litigation is known as Jennifer Liotta, et. al. v. Wolford Boutiques, LLC, Case No. 1:16-cv-04634-MHC. One of the persons who received the text, Jennifer Liotta, sued Wolford and is called the "Plaintiff." Wolford is called the "Defendant."

2. What is this lawsuit about?

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WHO IS PART OF THE SETTLEMENT?

- 5. How do I know if I am part of the settlement?

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THE SETTLEMENT BENEFITS

- 6. What does the settlement provide?

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A more detailed description of these benefits is available in the Settlement Agreement which is available at the **Important Documents** page of this website.

- 7. What can I get from the settlement?

Gift Card: Class Members who received just one of the Text Message(s) will each receive a \$60.00 gift card provided they submitted a timely Claim Form. Class Members who received both Text Message(s) will receive a \$120.00 gift card provided they submitted a timely Claim Form. Gift Cards are transferable and have no expiration date. You must have submitted a Claim Form to receive the Gift Card.

The Claims Deadline passed on **November 5, 2018**.

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The Settlement Class has two levels of members.

Tier One Class Members will receive a \$60 Gift Card. Tier One Class Members are recipients that received just one of the Text Message(s).

Tier Two Class Members will receive a \$120.00 Gift Card. Tier Two Members are recipients that received both of the Text Message(s).

There is no reduction of award to Class Members that will result from the level of Class Member participation in this settlement. All Class Members who submitted timely Claim Forms and who received either one or both of the Text Message(s) will receive the Tier One or the Tier Two Gift Card. The amount of the Service Fee and Attorneys' Fees paid by Wolford pursuant to this Settlement is in addition to and will not impact the amounts paid to Class Members.

The Claims Deadline passed on **November 5, 2018**.

HOW TO GET BENEFITS?

- 9. How do I get a Gift Card?

You must have been a member of the Settlement Class and submitted a claim by the Claims Deadline. The Claims Deadline passed on **November 5, 2018**.

- 10. When will I receive my Gift Card?

If you submitted a complete, accurate, valid, and timely Claim Form, the Settlement Administrator will send your Gift Card to you after the settlement is finally approved and all appeals and other reviews have been resolved or exhausted. The process is likely to take several months.

- 11. What am I giving up to stay in the Settlement Class?

Unless you excluded yourself from the settlement, you will give up your right to sue Wolford and its affiliates/vendors or be part of any other lawsuit against Wolford and its affiliates/vendors about the issues this settlement resolves. Unless you excluded yourself, all of the Court's decisions will bind you. The specific claims you are giving up against Wolford and other released parties affiliated with Wolford are called "Claims." The Claims are described in the Settlement Agreement which is available at the **Important Documents** page of this website. The Settlement Agreement describes the Claims you would be releasing with specific and accurate legal descriptions, so read it carefully.

- EXCLUDING YOURSELF FROM THE SETTLEMENT

If you wanted to keep the right to sue or continue to sue Wolford based on Claims this settlement resolves, you must have taken steps to get out of the Settlement Class.

- 12. How do I exclude myself from the settlement?

You must have submitted an opt out by the Opt-Out Deadline to the Settlement Administrator. The deadline to opt out of the Settlement was on **OCTOBER 5, 2018**.

- **13. If I exclude myself, can I still get a Gift Card or the benefit of the Injunction?**

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No. If you excluded yourself, you cannot receive the Gift Card or the benefit of the Injunction.

THE LAWYERS REPRESENTING YOU

- **14. Do I have a lawyer in the case?**

Yes. The Court appointed the following attorneys to represent you and other Settlement Class Members as "Settlement Class Counsel." Class Counsel in this case are Scott L. Bonder and Joseph A. White of Fried & Bonder, LLC, 1170 Howell Mill Road, NW, Suite 305, Atlanta, Georgia 30318.

You will *not* be charged by these lawyers for their work on the case. If you want to be represented by your own lawyer, you may hire one at your own expense.

- **15. How will the lawyers be paid?**

Settlement Class Counsel will ask the Court to award attorneys' fees, and reimburse reasonable costs and expenses. Wolford has agreed to jointly move for approval by the Court of a payment directly from Wolford to Class Counsel in the amount of \$137,480.00. These fees and costs will be paid separately by Wolford and will not reduce the amount of benefits provided to the Class.

OBJECTING TO THE SETTLEMENT

- **16. How do I tell the Court that I don't like the settlement?**

You must have submitted an objection to the Settlement Administrator by the Objection Deadline. The deadline to object to the Settlement was on **OCTOBER 5, 2018**.

- **17. What's the difference between objecting and excluding myself?**

Objecting is simply telling the Court that you don't like something about the settlement, but you remain a member of the Settlement Class.

Excluding yourself is telling the Court that you don't want to be included in the settlement. If you exclude yourself, you have no basis to object to the settlement and related releases because the settlement no longer affects you.

FINAL APPROVAL HEARING

- **18. When and where will the Court decide to approve the settlement?**

The Court will hold a Final Approval Hearing at **10:00 a.m. [EST]** on **November 20, 2018**, in the Courtroom of Judge Cohen at the U.S. District Court for the Northern District of Georgia, located in Courtroom 1905 of the Richard B. Russell Federal Building and United States Courthouse, 75 Ted Turner Dr., SW, Atlanta, Georgia 30303-3309. The hearing may be postponed to a different date or time without notice, so it is a good idea to check this website or call **1-833-288-5301**.

At the Final Approval Hearing, the Court will consider whether the settlement is fair, reasonable, and adequate. If there are objections, the Court will consider them. The Court will listen to people who appear at the hearing. The Court may also decide how much Settlement Class Counsel will receive as attorneys' fees and costs and whether to award service payments to Settlement Class Representatives. After the Final Approval Hearing, the Court will decide whether to approve the settlement. We do not know how long these decisions will take.

- 19. Do I have to come to the hearing?

No. Settlement Class Counsel will answer questions the Court may have. However, you are welcome to come at your own expense. If you submitted a written objection, you don't have to come to Court to talk about it. As long as you submitted your written objection on time, the Court will consider it. You may also pay your own lawyer to attend, but it's not necessary.

IF I DO NOTHING

- 20. What happens if I do nothing?

If you are a Settlement Class Member and do nothing, then you will not receive a Gift Card and your Claims against Wolford and its affiliates will be released. This means that you will not be able to start a lawsuit or be part of another lawsuit against Wolford or its affiliates over the Claims resolved by the settlement. You will receive the benefit of the injunction.

GETTING MORE INFORMATION

- 21. How do I get more information?

The notice summarizes the settlement. More details are in the Settlement Agreement itself. You can get a copy of the Settlement Agreement at the **Important Documents** page of this website or from the Settlement Administrator by calling toll-free **1-833-288-5301** or writing to the Settlement Administrator at **Liotta v. Wolford Boutiques, LLC Settlement, JND Legal Administration, P.O. Box 91349, Seattle, WA 98111**. The status of the settlement, any appeals, any claims made, and the date of award distributions will be posted on the Settlement Website.

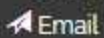
FOR MORE INFORMATION

Visit this website often to get the most up-to-date information.



Call

1-833-288-5301



Email

info@tcpaclassbenefits.com



Mail

Liotta v. Wolford Boutiques, LLC Settlement
JND Legal Administration
PO Box 91349
Seattle, WA 98111

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[FAQs](#)

[File a Claim](#)

[Contact Us](#)

ONLINE CLAIM FORM

The Online Claims Deadline passed on **November 5, 2018**. If you have any questions, or would like additional information, please visit the **FAQs** page.

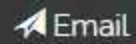
FOR MORE INFORMATION

Visit this website often to get the most up-to-date information.



Call

1-833-288-5301



Email

info@tcpaclassbenefits.com



Mail

Liotta v. Wolford Boutiques, LLC Settlement
JND Legal Administration
PO Box 91349
Seattle, WA 98111



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Liotta v. Wolford Boutiques, LLC Settlement

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CONTACT US

IMPORTANT: Before contacting the Claims Administrator, please review the **FAQs** page, which provides the answers to many basic questions.

Mailing Address

Liotta v. Wolford Boutiques, LLC Settlement
c/o JND Legal Administration
PO Box 91349
Seattle, WA 98111

Telephone

1-833-288-5301

Email

info@tcpaclassbenefits.com

Note: For security purposes, all address updates must be made in writing. To update your address, please email the Claims Administrator using the email form below, or update your address via mail. Please include the settlement name, Liotta v. Wolford Boutiques, LLC Settlement, and your old mailing address for verification purposes.

Email Us

When contacting the Claims Administrator via email, please complete the form below and we will respond to your request at the email address provided.

Topic	<input type="text" value="[Choose reason for contact]"/>	Address	<input type="text"/>
Name	<input type="text"/>		
Telephone	<input type="text"/>	City	<input type="text"/>
Email Address	<input type="text"/>	State/Province	<input type="text"/>
		Zip/Postal Code	<input type="text"/>
		Question/Comments	<input type="text"/>

SUBMIT

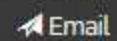
FOR MORE INFORMATION

Visit this website often to get the most up-to-date information.



Call

1-833-288-5301



Email

info@tcpaclassbenefits.com



Mail

Liotta v. Wolford Boutiques, LLC Settlement
JND Legal Administration
PO Box 91349
Seattle, WA 98111

EXHIBIT C



Liotta v. Wolford Boutiques, LLC Settlement (as of August 15, 2018)

MAIL NOTICE – Initial Mailing: August 6, 2018

Initial Notices mailed via USPS:	4488
Notices Returned:	0
Notices Forwarded to Address Provided by USPS and Not Returned:	0
Notice Skip-Trace Attempts:	0
Notices Resent After Research and Not Returned:	0

SETTLEMENT WEBSITE – Launch Date: July 27, 2018

Total New Users:	184
Total Pageviews:	1,053

CLAIMS STATUS – Claim Filing Deadline: November 5, 2018

Total Claims Received:	39
Total Claims Approved:	0
Total Claims Denied:	0

OPT-OUTS – Exclusion Deadline: October 5, 2018

Total Opt-Outs Received:	0
Opt-Outs/Objections Returned to Sender with Deficiency Notice:	0



Liotta v. Wolford Boutiques, LLC Settlement (as of August 29, 2018)

MAIL NOTICE – Initial Mailing: August 6, 2018

Initial Notices mailed via USPS:	4488
Notices Returned as Undeliverable:	162
Notices Forwarded to Address Provided by USPS and Not Returned:	0

SETTLEMENT WEBSITE – Launch Date: July 27, 2018

Total New Users Since Last Claims Report:	119
Total Users:	299
Total New Pageviews Since Last Claims Report:	334
Total Pageviews:	1,387

CLAIMS STATUS – Claim Filing Deadline: November 5, 2018

Total Claims Received:	66
Claims Received Since Last Claims Report:	27
Total Claims Approved:	59
Claims Approved Since Last Claims Report:	59
Claims Pending Verification:	7
Total Claims Denied:	0
Claims Denied Since Last Claims Report:	0

OPT-OUTS – Exclusion Deadline: October 5, 2018

Total Opt-Outs Received:	0
Opt-Outs/Objections Received Since Last Claims Report:	0
Total Opt-Outs/Objections Received:	0

TELEPHONE ASSISTANCE PROGRAM (1-833-288-5301)

Total Calls Received and Responded To:	37
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Liotta v. Wolford Boutiques, LLC Settlement (as of September 12, 2018)

MAIL NOTICE – Initial Mailing: August 6, 2018

Initial Notices mailed via USPS:	4488
Notices Returned as Undeliverable:	163
Notices Forwarded to Address Provided by USPS and Not Returned:	0

SETTLEMENT WEBSITE – Launch Date: July 27, 2018

Total New Users Since Last Claims Report:	67
Total Users:	366
Total New Pageviews Since Last Claims Report:	220
Total Pageviews:	1,607

CLAIMS STATUS – Claim Filing Deadline: November 5, 2018

Total Claims Received:	73
Claims Received Since Last Claims Report:	6
Total Claims Approved:	69
Claims Approved Since Last Claims Report:	10
Claims Pending Verification:	4
Total Claims Denied:	0
Claims Denied Since Last Claims Report:	0

OPT-OUTS – Exclusion Deadline: October 5, 2018

Total Opt-Outs Received:	0
Opt-Outs/Objections Received Since Last Claims Report:	0
Total Opt-Outs/Objections Received:	0

TELEPHONE ASSISTANCE PROGRAM (1-833-288-5301)

Total Calls Received and Responded To:	39
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Liotta v. Wolford Boutiques, LLC Settlement (as of September 26, 2018)

MAIL NOTICE – Initial Mailing: August 6, 2018

Initial Notices mailed via USPS:	4,488
Notices Returned as Undeliverable:	513
Net Undeliverable Notices:	177

SETTLEMENT WEBSITE – Launch Date: July 27, 2018

Total New Users Since Last Claims Report:	516
Total Users:	882
Total New Pageviews Since Last Claims Report:	936
Total Pageviews:	2,543

CLAIMS STATUS – Claim Filing Deadline: November 5, 2018

Total Claims Received:	82
Claims Received Since Last Claims Report:	9
Total Claims Approved:	78
Claims Approved Since Last Claims Report:	9
Claims Pending Verification:	4
Total Claims Denied:	0
Claims Denied Since Last Claims Report:	0

OPT-OUTS – Exclusion Deadline: October 5, 2018

Total Opt-Outs Received:	0
Opt-Outs/Objections Received Since Last Claims Report:	0
Total Opt-Outs/Objections Received:	0

TELEPHONE ASSISTANCE PROGRAM (1-833-288-5301)

Total Calls Received and Responded To:	52
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Liotta v. Wolford Boutiques, LLC Settlement (as of October 10, 2018)

MAIL NOTICE – Initial Mailing: August 6, 2018

Initial Notices mailed via USPS:	4,488
Notices Returned as Undeliverable:	518
Net Undeliverable Notices:	177

SETTLEMENT WEBSITE – Launch Date: July 27, 2018

Total New Users Since Last Claims Report:	464
Total Users:	1,346
Total New Pageviews Since Last Claims Report:	979
Total Pageviews:	3,522

CLAIMS STATUS – Claim Filing Deadline: November 5, 2018

Total Claims Received:	154
Claims Received Since Last Claims Report:	72
Total Claims Approved:	79
Claims Approved Since Last Claims Report:	1
Claims Pending Verification:	1
Total Claims Denied:	74
Claims Denied Since Last Claims Report:	74

OPT-OUTS – Exclusion Deadline: October 5, 2018

Total Opt-Outs Received:	0
Opt-Outs/Objections Received Since Last Claims Report:	0
Total Opt-Outs/Objections Received:	0

TELEPHONE ASSISTANCE PROGRAM (1-833-288-5301)

Total Calls Received and Responded To:	63
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Liotta v. Wolford Boutiques, LLC Settlement (as of October 24, 2018)

MAIL NOTICE – Initial Mailing: August 6, 2018

Initial Notices mailed via USPS:	4,488
Notices Returned as Undeliverable:	593
Net Undeliverable Notices:	211

SETTLEMENT WEBSITE – Launch Date: July 27, 2018

Total New Users Since Last Claims Report:	903
Total Users:	2,249
Total New Pageviews Since Last Claims Report:	1,766
Total Pageviews:	5,288

CLAIMS STATUS – Claim Filing Deadline: November 5, 2018

Total Claims Received:	198
Claims Received Since Last Claims Report:	44
Total Claims Approved:	86
Claims Approved Since Last Claims Report:	7
Claims Pending Verification:	1
Total Claims Denied:	111
Claims Denied Since Last Claims Report:	36

OPT-OUTS – Exclusion Deadline: October 5, 2018

Total Opt-Outs Received:	0
Opt-Outs/Objections Received Since Last Claims Report:	0
Total Opt-Outs/Objections Received:	0

TELEPHONE ASSISTANCE PROGRAM (1-833-288-5301)

Total Calls Received and Responded To:	82
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Liotta v. Wolford Boutiques, LLC Settlement (as of November 7, 2018)

MAIL NOTICE – Initial Mailing: August 6, 2018

Initial Notices mailed via USPS:	4,488
Notices Returned as Undeliverable:	593
Net Undeliverable Notices:	211

SETTLEMENT WEBSITE – Launch Date: July 27, 2018

Total New Users Since Last Claims Report:	1,198
Total Users:	3,447
Total New Pageviews Since Last Claims Report:	2,351
Total Pageviews:	7,639

CLAIMS STATUS – Claim Filing Deadline: November 5, 2018

Total Claims Received:	264
Claims Received Since Last Claims Report:	198
Total Claims Approved:	91
Claims Approved Since Last Claims Report:	5
Claims Pending Verification:	0
Total Claims Denied:	173
Claims Denied Since Last Claims Report:	62

OPT-OUTS – Exclusion Deadline: October 5, 2018

Total Opt-Outs Received:	0
Opt-Outs/Objections Received Since Last Claims Report:	0
Total Opt-Outs/Objections Received:	0

TELEPHONE ASSISTANCE PROGRAM (1-833-288-5301)

Total Calls Received and Responded To:	94
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